

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

03 APR 2003 12:19

U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

vs.

Case No. 8:03-CR-77-T-30TBM

GHASSAN ZAYED BALLUT

**DEFENDANT GHASSAN BALLUT'S UNOPPOSED
MOTION TO MODIFY CONDITIONS FOR RELEASE**

The Defendant, GHASSAN ZAYED BALLUT, by and through his undersigned counsel, hereby requests this Honorable Court to modify the condition of release restricting travel by the Defendant to the Middle District of Florida, and as grounds therefor would state:

1. In the Court's Order of April 10, 2003 (Dkt. #74), setting the conditions of the Defendant's release, the Defendant's travel is restricted to the Middle District of Florida, but in note 31 the Court states that if the Defendant "is unable to meet this demand, he must make application to the Court."
2. The Defendant is a 16-year resident of the Chicago, Illinois, area, and has owned his residence with his wife, Hanan Ballut, in Chicago since 1999.
3. The Defendant's wife and four minor children reside in the Defendant's Chicago home.
4. The Defendant owns and operates a dry cleaning and alterations shop in Chicago which was operated entirely by the Defendant, his wife, and a part-time employee prior to the Defendant's arrest, and at present the Defendant's wife and the part-time employee are the only people available to operate the business in the absence of the Defendant.
5. The Defendant and his wife are the sole support of themselves and their four children.

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6. The Defendant is required as a condition of his release to maintain verifiable employment, and permitting the Defendant to return to his business in Chicago would facilitate his compliance with this condition.

7. The prolonged restriction of the Defendant's travel to the Middle District of Florida would continue to adversely affect his family and their ability to earn income.

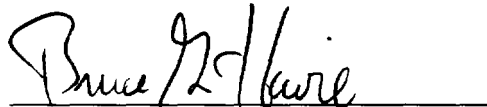
8. If permitted to return to his Chicago residence and business, the Defendant would have no need to travel outside the limits of Cook County, Illinois, except for the purpose of returning to the Middle District of Florida to prepare his defense and answer the call of the Court.

9. The Defendant would agree to additional restrictions to facilitate his return to Chicago, including reporting to Pretrial Services in Chicago as directed and advising Pretrial Services of travel between Cook County, Illinois, and the Middle District of Florida.

10. The Defendant's undersigned counsel has contacted the United States Attorney concerning this motion, and the United States Attorney has no objection.

WHEREFORE, the Defendant requests this Honorable Court to modify the travel conditions of the Court's Order of April 10, 2003, to permit the Defendant to travel to and remain in both the Middle District of Florida and Cook County, Illinois.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Bruce G. Howie", is written over a horizontal line.

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Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by U.S.

Mail to the following this 22nd day of April, 2003:

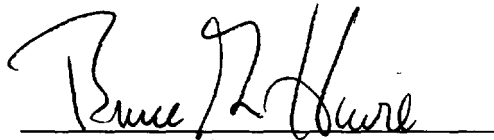
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